

# **EXHIBIT 5**

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Subject: RE: Parmalat: deponents lists

Counsel,

Attached is the draft proposed deponent list on behalf of Dr. Bondi's  
counsel, class counsel, and counsel for Food & Dairy/Parmalat Capital  
Finance. I apologize for the short delay due to data problems. We look  
forward to reviewing defendants' list and discussing with you on tomorrow's  
5:00 p.m. EST call.

Regards,

Terry L. Wit  
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In re Parmalat Securities Litigation, 04 MD 1653 (LAK)  
Proposed List of Deponents

Other Deponents <sup>8</sup>	Entity:	Bond <sup>1</sup>	Class Counsel	F&D/ Capital Finance Plaintiffs <sup>9</sup>	Total Plaintiffs*	Defendants	Total All Parties
<i>Aranca Company</i>							
Calogero, Lucio	Aranca Company		7		7		
<i>Banca San Marino</i>							
	Partner of Banca San Marino; International Food		4		4		
Colnago, Luigi Enrico							
<i>Banco Totta</i>							
Leite, Jose Nogueira	Banco Totta		4		4		
<i>Blue Ridge Investments</i>							
Rule 30(b)(6) witness(es) regarding Bank of America's role in the purchase of certain FHL Notes by Blue Ridge Investments, LLC.	Blue Ridge Investments, LLC			3	3		
<i>Bonlat</i>							
Brattvet, Thomas Michael	Bonlat	4	4	7	12		
<i>Capital Finance</i>							
Auda, Sonia	Capital Finance	2		2	3		
Falomo, Luca Maria	Capital Finance	2		2	3		
Manduca, Martin	Capital Finance	4		4	6		
Ngailkpima, Jean-Michel	Capital Finance	2		2	3		
Petruccei, Andrea	Capital Finance	4		4	6		
Stafrace, Ian	Capital Finance	4		4	6		
Zammit, Claire Stafrace	Capital Finance	4		4	6		
<i>CUR Holdings</i>							

Other Deponents <sup>8</sup>	Entity:	Bondi <sup>1</sup>	Class Counsel	F&D/ Capital Finance Plaintiffs <sup>9</sup>	Total Plaintiffs*	Defendants	Total All Parties
Rule 30(b)(6) witnesses from CUR Holdings Ltd. re loans to Capital Finance.	CUR Holdings Ltd.	4		14	14		
Mette, Suzan	CUR Holdings			4	4		
<i>Deutsche Bank</i>							
Armanini, Massimo	Deutsche Bank		14		14		
Pracca, Marco	Deutsche Bank		7		7		
<i>Empresa Cubana Importadora</i>							
Alvarez, Pedro Borrego	Empresa Cubana Importadora	4	4		6		
<i>Epicurum</i>							
Garrido-Sutil, Victor	Epicurum	4	4		6		
<i>Eurofood IFSC</i>							
Rule 30(b)(6) witnesses from Eurofood IFSC Limited re loans funded by Capital Finance	Eurofood IFSC Limited	7		7	11		
Laughlin, Ambrose	Director of Eurofood IFSC Limited	4		7	9		
<i>F&amp;D</i>							
Additional F&D directors (as necessary)	F&D	4		7	9		
Baker, Anthony	F&D	4		7	9		
Couch, Martin	F&D	4		7	9		
Hinds, Phillip	F&D	4		7	9		
Thompson, Hugh	F&D	4		7	9		
<i>GKB</i>							
Rule 30(b)(6) witness(es) from GKB regarding political risk contracts and Luca Sala's accounts	GKB	7			7		

Other Deponents <sup>8</sup>	Entity:	Bondi <sup>1</sup>	Class Counsel	F&D/ Capital Finance Plaintiffs <sup>9</sup>	Total Plaintiffs*	Defendants	Total All Parties
Giuralarocca, Nino	GKB	14	7	4	20		
Gudemann, Noelle	GKB		7		7		
<i>HIT</i>							
Branchi, Fabio	HIT		7		7		
<i>Independent Investigator</i>							
Chiaruttini, Stefania	Independent Investigator		14	7	17		
<i>Interregional Reinsurance</i>							
Rule 30(b)(6) witness from Interregional Reinsurance / regarding transaction in Class Action Complaint	Interregional Reinsurance		7		7		
<i>Italaudit</i>							
Amendola, Sergio	Italaudit	4	4		6		
Bertolli, Francesco	Italaudit	7	7		11		
<i>Maduro &amp; Curiel's Bank</i>							
Boyko, William	Maduro & Curiel's Bank	4			4		
Cox, Pieter	Maduro & Curiel's Bank	4			4		
<i>Maples &amp; Calder</i>							
Pope, Adrian	Maples & Calder		7	4	9		
Rule 30(b)(6) witness(es) from Maples & Calder / Maples Finance regarding transactions in Dr. Bondi's First Amended Complaint	Maples & Calder	14		4	14		
<i>Mayer Brown</i>							
Wright, Nigel	Mayer Brown			7	7		
<i>Morgan Stanley</i>							

Other Deponents <sup>8</sup>	Entity:	Bondi <sup>1</sup>	Class Counsel	F&D/ Capital Finance Plaintiffs <sup>9</sup>	Total Plaintiffs*	Defendants	Total All Parties
Heaney, Michael	Morgan Stanley		7		7		
Pagliani, Carlo	Morgan Stanley Italy		4		4		
Basso, Paolo	Morgan Stanley London		7		7		
Basso, Luigi	Morgan Stanley London		7		7		
<i>New Zealand Dairy Board</i>							
Rule 30(b)(6) witnesses from New Zealand Dairy Board re notes purchased by Capital Finance	New Zealand Dairy Board			14	14		
<i>Nextra</i>							
Canizzaro, Antonio	Nextra		7		7		
Landi, Giovanni	Nextra		4		4		
Ratti, Marco	Nextra		4		4		
Valsecchi, Marco	Nextra		4		4		
<i>Parnalat Group</i>							
Barli, Domenico	Parnalat	4	7	4	12		
Bocchi, Gianfranco	Parnalat	14	4	4	18		
Borrà, Narciso	Parnalat	4	7		9		
Brughera, Mario	Parnalat	4	7	4	12		
Cochelin, Patrice	Parnalat		4		4		
del Soldato, Luciano	Parnalat	7	14	7	22		
Ferraris, Alberto	Parnalat	7	14	4	20		
Ferretti, Oreste	Parnalat	7	7	4	14		
Nuti, Massimo	Parnalat	7	7	4	14		
Pedraneschi, Giorgio	Parnalat		7		7		

Other Deponents <sup>8</sup>	Entity:	Bondi <sup>1</sup>	Class Counsel	F&D/ Capital Finance Plaintiffs <sup>9</sup>	Total Plaintiffs*	Defendants	Total All Parties
Pessina, Claudio	Parnalat	14	14	4	26		
Tanzi, Calisto	Parnalat	7	14	7	22		
Tonna, Fausto	Parnalat	7	14	7	22		
Viotto, Francesco	Parnalat	7	4		9		
Borzone, Miguel Angel Reyes	Parnalat Admin	4		7	9		
Imanichi, Marilza	Parnalat Admin	4		7	9		
Medugno, Fabio Conti	Parnalat Admin			7	7		
Rodrigues, Ariovaldo Green	Parnalat Admin			7	7		
White, Stephen Alan	Parnalat Affiliated Companies	7	7		11		
Rule 30(b)(6) witnesses from Parnalat Argentina re loans funded by Capital Finance	Parnalat Argentina SA			14	14		
Baranchalo, Marcho	Parnalat Brazil	4		7	9		
Conti, Fabio	Parnalat Brazil	7	7		11		
da Silva, Cleber Valeriano	Parnalat Brazil			4	4		
Grisendi, Gianni	Parnalat Brazil	7	14	4	20		
Marzili, Pier Giovanni	Parnalat Finanziaria SpA	4	4		6		
Cortopassi, Giancarlo	Parnalat Participacoes	4	7		9		
Monteiro, Carlos	Parnalat Participacoes	4	7	7	14		
Bondi, Dr. Enrico	Parnalat S.p.A.			7	7		
Giuffredi, Francesco	Parnalat S.p.A.	4		4	6		
Gorrei, Franco	Parlamat S.p.A.	4		7	9		
Martellini, Maria	Parnalat S.p.A.	7		7	11		
Poma, Alessandra	Parnalat S.p.A.			7	7		

Other Deponents <sup>8</sup>	Entity:	Bond <sup>1</sup>	Class Counsel	F&D/ Capital Finance Plaintiffs <sup>9</sup>	Total Plaintiffs*	Defendants	Total All Partes
Silingardi, Luciano	Parmalat S.p.A.	4		4	6		
Spadafora, Nicola	Parmalat S.p.A.			4	4		
Tanzi, Giovanni	Parmalat S.p.A.	7		7	11		
Tanzi, Stefano	Parmalat S.p.A.	7		7	11		
Sweeny, Nancy	Parmalat USA	4		4	6		
Uva, Aldo	Parmalat USA	4		4	6		
Rule 30(b)(6) witnesses from Parmalat de Venezuela CA re loans funded by Capital Finance.	Parmalat de Venezuela CA			14	14		
Bonici, Giovanni	Parmalat Venezuela	4	7	4	12		
<i>PFC BV</i>							
Muus, Hermannus	PFC BV	4	7		9		
<i>Private Broker</i>							
Maletta, Fabio	Private Broker	7	4		9		
<i>PwC</i>							
Lagro, Franco	PwC		7		7		
Ghiringhelli, Marco	PwC		7	4	9		
Abriel, Keith	PwC Cayman			4	4		
Keny, Andrea	PwC Cayman			4	4		
Sunley, Graeme	PwC Cayman			4	4		
<i>Sumitomo Bank Financial Services</i>							
Kato, Y.	Sumitomo Bank Financial Services	4			4		
Willet, A.	Sumitomo Bank Financial Services	4			4		
<i>Tetra Pak Ltda.</i>							

Other Deponents <sup>8</sup>	Entity:	Bondi <sup>1</sup>	Class Counsel	F&D/ Capital Finance Plaintiffs <sup>9</sup>	Total Plaintiffs*	Defendants	Total All Parties
Rule 30(b)(6) witnesses from Tetra Pak Ltda re notes purchased by Capital Finance	Tetra Pak Ltda	4		14	14		
<i>QSPV</i>							
Hopkins, Matthew	QSPV	4		7	9		
<i>UBS</i>							
Cozzoli, Patrizia	UBS		7		7		
Foti, Alessandro	UBS		7		7		
Gartner, David	UBS London		7		7		
Lisanti, Fabio	UBS London		7		7		
<i>Web Holdings</i>							
Brennan, Thomas C.	Web Holdings	4	7	4	12		
Williams, Angela	Web Holdings	7	7		11		
<i>Wells Fargo</i>							
Rule 30(b)(6) witness(es) from Wells Fargo regarding transactions in Dr. Bondi's First Amended Complaint	Wells Fargo	10		4	11		
<i>Willis Corroon Group</i>							
Gray, Stephen	Willis Corroon Group		7		7		
<i>Wishaw Trading</i>							
Ventura, Andrea	Wishaw Trading	7	14	4	20		
<i>Zini &amp; Associates</i>							
Sbarbo, Gina	Z&A New York Office	4	7		9		
Andrioli, Simonetta	Zini & Assoc.	4	7		9		
Anticoli, Alomi	Zini & Assoc.	4	4	4	10		
Zini, GianPaolo	Zini & Assoc.	4	14	4	18		

Other Deponents <sup>8</sup>	Entity:	Bondi <sup>1</sup>	Class Counsel	F&D/ Capital Finance Plaintiffs <sup>9</sup>	Total Plaintiffs*	Defendants	Total All Parties
<i>Other</i>							
Melford, Vaughn Neto		7	7		11		
Potential Depositions of Italian Authorities or Their Experts		21		4	20		
Rule 30(b)(6) witnesses from Food and Dairy Noteholders and holders of Capital Finance debt	Various			14	14		
Rule 30(b)(6) witness(es) from other miscellaneous third parties regarding Dr. Bondi's First Amended Complaint		14		7	17		
		415	456	414	1087		

<sup>1</sup> Dr. Bondi's time also includes anticipated time for plaintiffs in the actions recently transferred (or being transferred) by the MDL Panel.

<sup>8</sup> As with the witnesses in note 7, Dr. Bondi may wish to examine some of these witnesses who are not parties to his actions, but asks that he be able to reserve a block of 35 hours for those witnesses for whom he has not specifically requested time.

<sup>9</sup> Where counsel for Food & Dairy and Parmalat Capital Finance believe that additional time will be needed for a witness beyond the amount allotted by counsel for Dr. Bondi and class counsel, additional hours are added. Where no time is added, counsel for Food & Dairy and Parmalat Capital Finance believe that counsel for all plaintiffs can complete their questioning within the time allotted by counsel for Dr. Bondi and class counsel, but they specifically reserve at least one hour for questioning these witnesses. Counsel for Food & Dairy and Parmalat Capital Finance do not waive their right to ask questions during the time allotted by Dr. Bondi and class counsel.

\*Counsel for the plaintiffs in the consolidated cases estimate that where more than one plaintiff has requested time to examine a given witness, that time will overlap with the other plaintiff(s). Accordingly, plaintiffs have discounted the total expected time for these witnesses by 20%.